

1 James R. Rogers/SBN 99102  
2 [jrogers@jrrlaw.net](mailto:jrogers@jrrlaw.net)  
3 Jason Sparta/SBN 228458  
4 [jsparta@jrrlaw.net](mailto:jsparta@jrrlaw.net)  
5 LAW OFFICES OF JAMES R. ROGERS  
6 125 S. Highway 101, Suite 101  
7 Solana Beach, CA 92075  
8 Telephone: 858-792-9900  
9 Facsimile: 858-792-9509

10 Attorneys for Defendants  
11 EDUCATIONAL COMMISSION FOR  
12 FOREIGN MEDICAL GRADUATES  
13 erroneously sued as  
14 EDUCATION COMMISSION FOR  
15 FOREIGN MEDICAL GRADUATES; and  
16 FOUNDATION FOR ADVANCEMENT OF  
17 INTERNATIONAL MEDICAL EDUCATION  
18 AND RESEARCH

19  
20 UNITED STATES DISTRICT COURT  
21  
22 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

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24 ST.LUKE SCHOOL OF MEDICINE, et al. } Case No. CV-10-1791RGK (SHx)  
25 Plaintiff(s) }  
26 v. } NOTICE OF MOTION AND MOTION  
27 REPUBLIC OF LIBERIA, et al. } TO DISMISS PLAINTIFFS' FIRST  
28 Defendants. } AMENDED COMPLAINT FOR  
29  
30 } LACK OF PERSONAL  
31 } JURISDICTION  
32 } [FRCP Rule 12(b)(2)]  
33  
34 Date: June 14, 2010  
35 Time: 9:00 a.m.  
36 Courtroom: 850

37  
38 TO: PLAINTIFFS AND THEIR ATTORNEYS OF RECORD  
39 PLEASE TAKE NOTICE that on June 14, 2010 at 9:00 a.m., or as soon  
40 thereafter as the matter may be heard in the above-entitled court, located in the

1 Roybal Federal Building located at 255 East Temple St., Los Angeles, CA 90012,  
2 defendants EDUCATIONAL COMMISSION FOR FOREIGN MEDICAL  
3 GRADUATES erroneously sued as EDUCATION COMMISSION FOR  
4 FOREIGN MEDICAL GRADUATES and FOUNDATION FOR  
5 ADVANCEMENT OF INTERNATIONAL EDUCATION AND RESEARCH will  
6 move the court to dismiss the action pursuant to FRCP 12(b)(2) because plaintiffs  
7 do not have an adequate basis for personal jurisdiction over moving defendants, as  
8 plaintiffs lack both the traditional bases for jurisdiction (presence, domicile, or  
9 consent), as well as the “minimum contacts” necessary to establish personal  
10 jurisdiction over moving defendants.

11 With regard to the requirements of L.R. 7-3, the undersigned counsel was  
12 first assigned to represent moving defendants yesterday, May 11, 2010. The  
13 undersigned counsel attempted to reach plaintiffs’ counsel by phone on May 11,  
14 2010 and left a message. Plaintiffs’ counsel has not returned the call. Prior to the  
15 undersigned’s involvement, it is undersigned counsel’s understanding that  
16 plaintiffs’ counsel granted moving defendants an extension of time on their  
17 responsive pleading, which extension was communicated to co-counsel. However,  
18 the undersigned counsel learned today that plaintiffs’ counsel withdrew the  
19 extension of time.

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1           The motion will be based on this Notice of Motion and Motion, the  
2 Memorandum of Points and Authorities filed herewith, and the pleadings and  
3 papers filed herein.

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5           Dated:       May 12, 2010

LAW OFFICES OF JAMES R. ROGERS  
*James R. Rogers*

6           By: \_\_\_\_\_

7           James R. Rogers, Esq.  
8           Attorneys for Defendants  
9           EDUCATIONAL COMMISSION FOR  
10           FOREIGN MEDICAL GRADUATES  
11           erroneously sued as  
12           EDUCATION COMMISSION FOR  
13           FOREIGN MEDICAL GRADUATES and  
14           FOUNDATION FOR ADVANCEMENT  
15           OF INTERNATIONAL EDUCATION  
16           AND RESEARCH

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